

**UNITED STATES BANKRUPTCY COURT WESTERN
DISTRICT OF NORTH CAROLINA CHARLOTTE
DIVISION**

In Re: Vinroy W. Reid

Chapter 13

Case No. 18-31436

**OBJECTION TO DEBTOR'S COUNSEL'S INTERIM APPLICATION FOR FEES AND
EXPENSES**

Debtor through Independent Counsel hereby OBJECTS to his Counsel's Interim Application for Fees and Expenses dated January 22, 2019 for the following reasons:

1. Debtor does not recall receiving or signing a Retainer Agreement to hire Counsel at the rate and on the conditions upon which he is being charged;
2. Debtor recalls paying Counsel a \$10,000.00 Retainer but he is unsure of what the Retainer covered with the exception of a routine preparation of a Chapter 13 Petition and representation in the Chapter 13 through Plan confirmation which has not yet even occurred;
3. To date, Debtor has been billed approximately \$23, 0000.00 and he has not been kept informed of the status of his case. It was his understanding that the Attorney fees for representation in the Chapter 13 would be \$5,000.00 at most;
4. Debtor states that he was not aware that he was being billed for representation at the hourly rate of \$500.00 until Independent Counsel printed out a copy of the pending Fee Application from Pacer yesterday and showed him a copy;

WHEREFORE, Debtor prays that the Court :

1. Deny R. Keith Johnson's fee application and that Attorney Johnson be required to meet with Debtor and that Debtor be given a full accounting for services rendered.
 2. He also moves this Court to require that Attorney Johnson give him copies of any Retainer Agreements or any other documents showing that he agreed to representation in this Chapter 13 under the terms that have now come to light.
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3. If the Court find that the fees charged for this Chapter 13 were excessive and unreasonable that Attorney Johnson be required to disgorge any fees he received

which are deemed excessive and inappropriate.

/s/ Verna Bash-Flowers

Verna Bash-Flowers, Esq.

PO Box 927

Lowell, NC 28098 704-691-7220(Phone)

704-691-7321(Fax)

vnclaw.bashflowers@outlook.com

CERTIFICATE OF SERVICE

The undersigned hereby represents that the foregoing Objection to Debtor's Counsel's Interim Application for Fees and Expenses was served electronically on this 5th day of February, 2019, on the Standing Chapter 13 Trustee, Warren L. Tadlock; US Bankruptcy Administrator; Counsel for Debtor, R. Keith Johnson, and all parties who are entitled to receive electronic notice. It was also mailed to the creditors listed on the attached matrix.

Dated: February 5, 2019

/s/Verna Bash-Flowers

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Label Matrix for local noticing
0419-3
Case 18-31436
Western District of North Carolina
Charlotte
Tue Feb 5 11:55:22 EST 2019

CMG Eastland Urgent Care
c/o PMAB, LLC
4135 S. Stream Blvd., Ste. 4
Charlotte, NC 28217-4523

Chrysler Capital
Attn: Bankruptcy Dept.
P. O. Box 961278
Fort Worth, TX 76161-0278

David G. Guidry
Rabon Law Firm, PLLC
225 E Worthington Avenue Suite 100
Charlotte NC 28203-4868

Fern E. De Jonge, Esq.
7718 Flatlands Ave., 2nd Fl.
Brooklyn, NY 11236-3528

Hazelyn Mills
7329 Boswell Rd.
Charlotte, NC 28215-4502

CHS University Parent Hospital
c/o PMAB, LLC
4135 S. Stream Blvd., Ste. 4
Charlotte, NC 28217-4523

(p)CAPITAL ONE
PO BOX 30285
SALT LAKE CITY UT 84130-0285

Chase
710 S. Ash St., Ste. 200
Glendale, CO 80246-1989

Chrysler Capital
P.O. Box 961275
Fort Worth, TX 76161-0275

Duke Energy
c/o Online Collections
P. O. Box 1489
Winterville, NC 28590-1489

Home Depot
2455 Paces Ferry Rd.
Atlanta, GA 30339-6444

CHS Urgent Care-Eastland
c/o PMAB, LLC
4135 S. Stream Blvd., Ste. 4
Charlotte, NC 28217-4523

Carolina Pathology Clinical
c/o Financial Data Systems
1638 Military Cutoff Rd.
Wilmington, NC 28403-5716

Chase Records Center
Attn: Correspondence Mail
Mail Code LA4-5555
700 Kansas Lane
Monroe LA 71203-4774

City of Charlotte
P. O. Box 1316
Charlotte, NC 28201-1316

Duke Vinyl Products, Inc.
304 W. 32nd St.
Charlotte, NC 28206-2278

HSBC Bank USA, National Association
Andrew Lawrence Vining
Shapiro Ingle
10130 Perimeter Parkway, Ste. 400
Charlotte, NC 28216-0034

Internal Revenue Service
P.O. Box 7317
Philadelphia, PA 19101-7317

(p)INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

Marty E. King
5054 Gatsby Cir.
Rock Hill, SC 29732-7909

Mecklenburg County Tax Collector
Bob Walton Plaza
700 E. Stonewall St.
Charlotte, NC 28202-2780

Mid-Atlantic Emergency Medical
c/o Optimum Outcomes, Inc.
2651 Warrenville Rd.
Downers Grove, IL 60515-5544

Miranda Reid
3054 Chaffey Cir.
Decatur, GA 30034-4308

NC Department of Revenue
P.O. Box 25000
Raleigh, NC 27640-0100

NY State Dept. of Taxation and Finance
Civil Enforcement Division
W. A. Harriman Campus
Albany, NY 12227-0001

New York State Department of Taxation & Fina
Bankruptcy Section
PO Box 5300
Albany, NY 12205-0300

North Carolina Department of Revenue
Bankruptcy Unit
P.O. Box 1168
Raleigh, NC 27602-1168

Ocwen
P. O. Box 24738
West Palm Beach, FL 33416-4738

Ocwen Loan Servicing, LLC
Attn: Bankruptcy Department
PO Box 24605
West Palm Beach, FL 33416-4605

Thais Patricia Moran
6740 Venedale Glen Dr.
Charlotte, NC 28212-8438

Verol Reid
2556 Brentwood Pl.
Charlotte, NC 28208-7048

WGIV 1370 AM
Home Builder
9349 China Grove Ch. Rd.
Pineville, NC 28134-8531

Wells Fargo Card Services Visa
P. O. Box 10347
Des Moines, IA 50306-0347

Y2 Yoga
212 S. Tryon St., Ste. 375
Charlotte, NC 28281-0033

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Capital One
15000 Capital One Dr.
Richmond, VA 23238

Internal Revenue Service
320 Federal Place
Greensboro, NC 27401

| | |
|---------------------|----|
| End of Label Matrix | |
| Mailable recipients | 42 |
| Bypassed recipients | 0 |
| Total | 42 |

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

IN RE:)
)
VINROY W. REID) CASE NO. 18-31436
) CHAPTER 13
Debtor.)
_____)

NOTICE OF HEARING.

PLEASE TAKE NOTICE that Verna Bash-Flowers, independent counsel for Vinroy W. Reid (the "Debtor"), has file the following documents:

- (1) Motion for Appointment of Independent Counsel for the Sole Purpose of
Objecting to Debtor's Interim Application for Attorney Fees and
Expenses
- (2) Notice of Appearance and Request for Notice and Service of Papers
- (3) Objection to Debtor's Counsel's Interim Application for Fees and Expenses

PLEASE TAKE FURTHER NOTICE that a Hearing on these Pleadings is scheduled to be heard on **February 12, 2019 at 10:00 a.m (ET)** before the Honorable Laura T. Beyer in Court Room 1-5, United States Bankruptcy Court, 401 West Trade Street, Charlotte, North Carolina 28202.

Dated: This 5th day of February, 2019.

/s/ Verna Bash-Flowers

Verna Bash-Flowers, Esq.

PO Box 927

Lowell, NC 28092

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704-691-7321 (Fax)

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